

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IONUT MADALIN ZAMFIR, a/k/a Ionut
Madalin, a/k/a Madalin Zamfir,
DANIEL ANDRONACHE,
DUDU MUSI, a/k/a Musi Dudu,
RAZVAN TRASCA, and
IONUT ANDRONACHE,

Defendants.



8:24CR **87**

INDICTMENT

49 U.S.C. § 32703(2)
49 U.S.C. § 32709(b)
18 U.S.C. § 513(a) & (c)
18 U.S.C. § 2

The Grand Jury charges that

At times relevant and material to this Indictment:

1. Defendants IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin, a/k/a Madalin Zamfir, DANIEL ANDRONACHE, DUDU MUSI, a/k/a Musi Dudu, RAZVAN TRASCA, and IONUT ANDRONACHE, were engaged in the buying and selling of used motor vehicles.

2. Defendants IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin, a/k/a Madalin Zamfir, DANIEL ANDRONACHE, DUDU MUSI, a/k/a Musi Dudu, RAZVAN TRASCA, and IONUT ANDRONACHE, bought high-mileage, used motor vehicles; altered (rolled-back) and caused to be altered odometers and titles showing the vehicles had significantly less mileage; and sold the vehicles to consumers via Facebook Marketplace.

3. As referenced in this indictment, the following vehicle numbers refer to the vehicles identified below:

The Vehicles

Vehicle No.	Year/Make/Model	Vehicle Identification No.
1	2011 Toyota Sienna	5TDKK3DC3BS029372
2	2012 Dodge Ram 1500	1C6RD7FT4CS342959
3	2012 Honda Pilot	5FNYP4H5XCB018634
4	2013 Ford F-150	1FTFW1ET3DFA05228
5	2012 Ford F-150	1FTFW1ET1CFB02507
6	2014 Honda Odyssey	5FNRL5H91EB018661
7	2010 Ford F-150	1FTFW1EV9AKA57287
8	2007 Honda Odyssey	5FNRL38857B039947
9	2006 Honda Odyssey	5FNRL38856B116458

COUNTS 1 THROUGH 9

4. Paragraphs 1 through 3 are incorporated herein.

5. On or about the date ranges listed below, in the District of Nebraska, and elsewhere, Defendants IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin, a/k/a Madalin Zamfir, DANIEL ANDRONACHE, DUDU MUSI, a/k/a Musi Dudu, RAZVAN TRASCA, and IONUT ANDRONACHE, did knowingly and willfully reset and alter, and cause to be reset and altered, the odometers of the motor vehicles listed below, with the intent to change the mileage registered by said odometers, and did aid, abet, counsel, and procure the commission of each offense, each such instance constituting a separate Count of this Indictment:

Count	Defendant(s)	Approximate Dates of Vehicle Acquisition and Sale	Vehicle No.	Approximate High Mileage	Approximate False Low Mileage
1	Dudu Musi, a/k/a Musi Dudu, Ionut Madalin Zamfir a/k/a Ionut Madalin, a/k/a Madalin Zamfir	September 7, 2023 to October 14, 2023	1	278,689	149,061
2	Dudu Musi, a/k/a Musi Dudu	January 25, 2024 to February 19, 2024	2	271,868	132,000
3	Razvan Trasca	September 2023 to October 20, 2023	3	199,591	99,591

4	Razvan Trasca	September 20, 2023 to September 22, 2023	4	294,237	76,843
5	Razvan Trasca	September 16, 2023 to December 22, 2023	5	190,719	127,994
6	Ionut Andronache	March 13, 2024 to March 21, 2024	6	205,886	134,295
7	Daniel Andronache, Razvan Trasca	August 2023 to September 15, 2023	7	207,000	139,198
8	Daniel Andronache	August 1, 2023 to August 23, 2023	8	200,000 or greater	148,622
9	Ionut Andronache	March 20, 2024 to March 24, 2024	9	250,000 or greater	142,000

All in violation of Title 49, United States Code, Sections 32703(2) and 32709(b), and Title 18, United States Code, Section 2.

COUNTS 10 THROUGH 16

6. Paragraphs 1 through 3 are incorporated herein.

7. On or about the dates listed below, in the District of Nebraska, and elsewhere, Defendants IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin, a/k/a Madalin Zamfir, DANIEL ANDRONACHE, DUDU MUSI, a/k/a Musi Dudu, RAZVAN TRASCA, and IONUT ANDRONACHE, did knowingly make, utter, and possess, and caused to be made, uttered, and possessed, forged and counterfeited securities of the State of Nebraska and the State of Iowa – namely, certificates of title relating to the motor vehicles listed below – with the intent to deceive other persons, organizations, and governments, and did aid, abet, counsel, and procure the commission of each offense, each such instance constituting a separate Count of this Indictment:

Count	Defendant(s)	Approximate Date of Sale	Vehicle No.	Approximate High Mileage	Approximate False Low Mileage
10	Dudu Musi, a/k/a Musi Dudu, Ionut Madalin Zamfir, a/k/a Ionut Madalin, a/k/a Madalin Zamfir	October 14, 2023	1	278,689	149,061
11	Dudu Musi, a/k/a Musi Dudu	February 19, 2024	2	271,868	132,000
12	Razvan Trasca	October 20, 2023	3	199,591	99,591
13	Razvan Trasca	September 22, 2023	4	294,237	76,843
14	Razvan Trasca	December 22, 2023	5	190,719	127,994
15	Ionut Andronache	March 21, 2024	6	205,886	134,295
16	Daniel Andronache	August 23, 2023	8	200,000 or greater	148,622

All in violation of Title 18, United States Code, Sections 513(a) & (c) and 2.

A TRUE BILL.

A A

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

John E. Higgins, #19546
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT

for the
District of Nebraska

United States of America

v.

IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin,
a/k/a Madalin Zamfir*Defendant*Case No. 8:24CR⁸⁷

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) IONUT MADALIN ZAMFIR, a/k/a Ionut Madalin, a/k/a Madalin Zamfir,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Odometer tampering, in violation of Title 49, United States Code, Sections 2703(2) and 32709(b)
Utter and possess forged and counterfeit securities of a state, in violatin of Title 18, United States Code, Sections 513(a) &
(c).
Aiding and abetting, in violation of Title 18, United States Code, Section 2

Date: 5/20/24

Issuing officer's signature
City and state: Omaha, NebraskaDenise M. Lucks, Clerk of the Court*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*